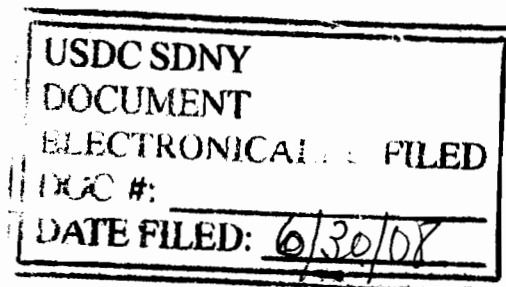


Greenberg Taurig

Eric B. Sigda
sigdae@gtlaw.com
212-801-9386



June 26, 2008

VIA HAND DELIVERY

Honorable Theodore H. Katz
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Diaz v. Scores Holding Co., et al.
Civil Action No.: 07 Civ. 8718 (RMB)(THK)

Dear Judge Katz:

We represent Defendants in the above-referenced action. We write to request an extension of the June 30, 2008 discovery cutoff date.

As you know, Plaintiffs have filed an action against Defendants alleging wage and hour violations under the Fair Labor Standards Act ("FLSA") and the New York State Labor Law. Plaintiffs have been granted conditional certification under the FLSA to represent a class consisting of two categories of individuals, one group who are W-2 tipped employees, such as cocktail servers, bartenders and waitresses, and a second group who are entertainers (and whom defendants have treated as independent contractors), at two clubs, one which was operated by defendant Go West Entertainment and one which is currently operated by defendant 333 East 60th Street, Inc. Go West had its liquor license revoked, closed the club and filed for bankruptcy, which bankruptcy proceeding is now pending in the U.S. Bankruptcy Court for the Southern District of New York. The New York State Liquor Authority has advised defendant 333 that its liquor license will also be revoked (as a related entity such revocation is automatic under State law).

Given these issues, defendants have not been able to comply with discovery under the existing schedule and the parties seek an extension thereto, to December 31, 2008. Plaintiffs' counsel joins in the request for such an extension. Defendants have produced to plaintiffs the names and addresses of all potential class members from the 333 club. The parties are hopeful that after notices are sent, and class members have an opportunity to "opt in" to the class, settlement negotiations might be more fruitful.

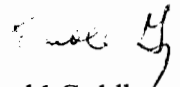
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We should also note that we, as defendants' counsel, have a pending motion to withdraw as counsel, which Judge Berman has indicated he will not grant until defendants obtain alternate counsel. A conference is scheduled before Judge Berman on July 24, 2008.

Therefore, we request that the Court extend discovery to December 31, 2008.

Respectfully,


Jerrold Goldberg

cc: Justin M. Swartz, Esq.
Tammy Marzigliano, Esq.
Outten & Golden LLP
3 Park Avenue, 29th Floor
New York, New York 10016
(212) 245-1000
Attorneys for Plaintiffs

*The discovery deadline is
extended to December 31, 2008.
Keep the Court apprised of future
developments.*

SO ORDERED

6/27/08


THEODORE H. KATZ
UNITED STATES MAGISTRATE JUDGE